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In the Matter of  
LPFM Proposal

Docket Number:  
MM 99-25

Comments of

Radio Free Nashville  
5703 Maudina Ave.  
Nashville TN 37209

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We would like first to make some general comments.

Radio Free Nashville (RFN) endorses the comments previously filed by Steve Hopp. The following comments are those of the undersigned members and supporters of RFN, and are intended as supplemental to those of Steve Hopp. We think Steve has done an outstanding job of boiling down a complex document to its most important points.

RFN wholeheartedly supports the basic ideas animating this proposal. We feel that the overwhelming consolidation of media ownership in remarkably few hands (particularly since the Telecommunications Act of 1996) has had disastrous consequences for a lively and vital democracy.

We feel this proposal is a necessary first step for the general public to regain reasonable access to the airwaves - airwaves that by law belong to the public already.

We concur with Steve Hopp's idea that a radio station should be able to be operated as a small business; we also understand the additional difficulties faced in funding a non-commercial station. Nonetheless, we feel that commercialism in radio has run rampant over the public interest for many years by promoting consumerism over citizenship. For this reason we believe non-commercial stations are more needed and should take precedence over commercial stations. We do not think these stations should be limited only to the small part of the spectrum presently allotted to non-commercial use.

We feel the whole purpose of the proposal will be defeated if the issuing of licenses is dependent in any way upon money. There should be no auctioning of licenses at all. We are equally opposed to any lotteries.

In cases where demand for licenses is greater than can be adequately met, we feel a time-sharing plan will fulfill the aim of increasing access better than a lottery or the auctioning of any new license to the highest bidder.

Few of the members of RFN are radio professionals, and only one has experience as a radio engineer. Thus many of the technical points on which the Commission is asking for comment lie rather outside our expertise.

We do, however, feel qualified to make some general points regarding technology.

We feel that technical objections to the proposal are largely spurious and based on outmoded information. More importantly, we feel strongly that public access to the public airwaves is not a "problem" to fit into technology. Technology must accommodate access, not the other way around. It would be as if, say, cars were found to be dangerously unsafe so the speed limit was reduced to 15 (strictly enforced!) rather than a way found to build safe cars.

In addition, we would like to suggest that the Commission consider opening up the area between 100 and 1000 watts. It could be that (based on availability of frequencies and the locations of

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existing transmitters) a given region might be able to support, say, two 300-watt stations but no 1000-watt station at all. In such cases we believe two is far better than none.

On specific points:

1) We agree that the new stations should be FM only.

2) Regarding ownership:

We agree with the general guidelines advanced by the proposal. We are absolutely opposed to companies already entrenched in media ownership being able to pick up a few more stations on the cheap. Still, we see no reason why any individual or organization not so entrenched should not be able to operate low-power stations in more than one geographical area. A limit of five (certainly no more than ten) seems reasonable to establish at the beginning.

We recognize maintaining diversity and localism as key elements of the proposal, but we also feel that anyone who is doing broadcasting of exceptional quality or getting strong audience response should not be automatically limited to one small area. If you build a better mousetrap should you be forbidden to take it out of the neighborhood?

3) We oppose finite licenses. We recognize the concern that ordinary people should have access to the media, but we also feel that genuine achievement should not be required to "vacate the premises." Perhaps it comes down to the idea that license renewal should not be automatic - for anyone.

Two final points:

We recognize the delicacy of the situation regarding microbroadcasters. We feel that each application from a former "pirate" should be considered individually and without prejudice; by no means should these hardy souls be written off automatically.

We agree with the idea that the position of the microbroadcasters is similar to that of the early civil rights demonstrators or those who resisted serving in the war in Vietnam. Eventually the Carter Administration recognized that refusing to serve in Vietnam did not in and of itself make anyone criminal or "un-American" and declared a general Amnesty. If this can be done in that instance, it can also surely be done in this one.

Finally, we would like to reiterate that we consider implementation of this proposal to be a necessary first step. The public **MUST** have access to the public airwaves, and only time will determine the forms this access ultimately takes.

We understand this proposal as the first hesitant whispers of the voices of the people; we expect to hear these voices ever more forcefully in the future.

Radio Free Nashville

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July 28, 1999

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